

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

AMERICAN PATENTS LLC,

Plaintiff,

v.

MEDIATEK INC., MEDIATEK USA INC.,  
BROADCOM PTE. LTD., BROADCOM  
CORPORATION, LENOVO (SHANGHAI)  
ELECTRONICS TECHNOLOGY CO. LTD.,  
LENOVO GROUP, LTD., NXP  
SEMICONDUCTORS N.V., NXP B.V., NXP  
USA, INC., QUALCOMM INCORPORATED  
and QUALCOMM TECHNOLOGIES, INC.,

Defendants.

CIVIL ACTION NO. 6:18-CV-339-ADA

**DECLARATION OF LAI L. YIP IN SUPPORT OF SPECIALLY APPEARING  
DEFENDANTS LENOVO (SHANGHAI) ELECTRONICS TECHNOLOGY CO., LTD.  
AND LENOVO GROUP LTD.'S MOTION TO SEVER AND STAY PURSUANT TO THE  
CUSTOMER-SUIT EXCEPTION DOCTRINE**

I, Lai L. Yip, declare as follows:

1. I am an attorney admitted *pro hac vice* to practice before this Court. I am a partner with Sheppard Mullin Richter & Hampton, LLP, attorneys for specially appearing defendants Lenovo (Shanghai) Electronics Technology Co., Ltd. and Lenovo Group Ltd. (the “Lenovo Defendants”).

2. Attached hereto as **Exhibit A** is a true and correct copy of U.S. Patent No. 6,964,001.

3. Attached hereto as **Exhibit B** is a true and correct copy of U.S. Patent No. 7,836,371.

4. Attached hereto as **Exhibit C** is a true and correct copy of U.S. Patent No. 8,239,716.

5. Attached hereto as **Exhibit D** is a true and correct copy of U.S. Patent No. 8,996,938.

6. Attached hereto as **Exhibit E** is a true and correct copy of excerpts from Qualcomm Incorporated's 2018 Annual Report, a full copy of which can be obtained at <https://investor.qualcomm.com/annual-reports>.

7. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from MediaTek's 2017 Annual Report, a full copy of which can be obtained at <https://www.mediatek.com/investor-relations/financial-information/annual-reports>.

8. Attached hereto as **Exhibit G** is a true and correct copy of excerpts from NXP Semiconductors N.V.'s 2018 Annual Report, a full copy of which can be obtained at <http://services.corporate-ir.net/SEC.Enhanced/SecCapsule.aspx?c=209114&fid=16114934>. The foregoing webpage is hyperlinked from the following NXP webpage: <http://investors.nxp.com/phoenix.zhtml?c=209114&p=irol-sec#16114934>.

9. Attached hereto as **Exhibit H** is a true and correct copy of excerpts from Broadcom Inc.'s 2018 Annual Report, a full copy of which can be obtained at <http://investors.broadcom.com/phoenix.zhtml?c=203541&p=irol-reportsannual>.

10. Attached hereto as **Exhibit I** is a true and correct copy of Lenovo Group Limited's 2017/18 Annual Report, a full copy of which can be obtained at <https://investor.lenovo.com/en/publications/reports.php?year=2018>.

11. Attached hereto as **Exhibit J** is a true and correct copy of a printout of the webpage <https://www.qualcomm.com/products/snapdragon/processors/425>, titled "Snapdragon

425 Mobile Platform. It identifies “8917” as the “Part,” on 5. This appears to correspond to the “MSM8917” processor that is accused in the Complaint (Dkt. 1, ¶¶ 53, 74, 92, 111). As to the “APQ8017” processor also accused in the Complaint (*id.*), based on research my team and I conducted, it appears to be the same as the MSM8917 processor, except that the APQ8017 processor lacks a modem. *See, e.g., Snapdragon SKUs: 800 And 801 Explained*, <https://www.tomshardware.com/reviews/snapdragon-801-performance-xperia-z2,3777-2.html> (last visited Mar. 13, 2019).

12. The Lenovo Defendants conferred with Plaintiff regarding the Lenovo Defendants’ motion to sever and stay based on the customer-suit exception doctrine (the “Motion”), and Plaintiff confirmed that it opposes the Motion.

13. The Lenovo Defendants also conferred with Defendants MediaTek Inc., MediaTek USA Inc., Broadcom PTE. Ltd., Broadcom Corporation, NXP Semiconductors N.V., NXP B.V., NXP USA, Inc., Qualcomm Incorporated, and Qualcomm Technologies, Inc. regarding the Motion, and each confirmed that it does not oppose the Motion.

I declare under penalty of perjury under the federal laws of the United States that the foregoing is true and correct.

Executed on March 13, 2019 in San Francisco, California.

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/s/ *Lai L. Yip*  
Lai L. Yip